

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

GEORGIA FILM FUND SEVENTEEN
PRODUCTIONS, LLC,

Plaintiff/Counter-Defendant,

No. 1:14-CV-00032-KG-KK

v.

JUAN SANCHEZ, individually and as President of the
CHILILI LAND GRANT/LA MERCED DE CHILILI,
the LA MERCED DE PUEBLO DE CHILILI BOARD
OF TRUSTEES,

Defendants/Cross-Claim Defendants, and

and PATRICK ELWELL,

Defendant/Counter-Plaintiff

**CERTIFICATE OF SERVICE OF AMENDED INITIAL DISCLOSURES
OF GEORGIA FILM FUND SEVENTEEN PRODUCTIONS, LLC, PLAINTIFF**

Plaintiff Georgia Film Fund Seventeen Productions, LLC certifies that it served its Amended Initial Disclosures, together with this Certificate of Service, on the following counsel of record, via email, on February 24, 2015.

Narciso Garcia
Narciso Garcia, JR., LLC
2033 San Mateo Blvd., N.E.
Albuquerque, NM 87110
narcisolaw@aol.com

FOSTER, RIEDER & JACKSON, P.C.

By: /s/Geoffrey D. Rieder

Geoffrey D. Rieder

Sarah K. Downey

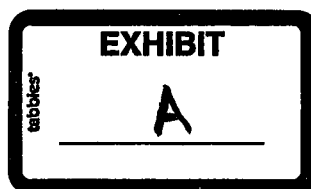
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*Attorneys for Plaintiff Georgia Film Fund
Seventeen Productions, LLC*



CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2015, a true and correct copy of the foregoing was served electronically by the Clerk on counsel of record.

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Albuquerque, NM 87110
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/S/Geoffrey D. Rieder
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**AMENDED INITIAL DISCLOSURES OF GEORGIA FILM FUND
SEVENTEEN PRODUCTIONS, LLC, PLAINTIFF**

Plaintiff Georgia Film Fund Seventeen Productions, LLC, hereby amends its initial disclosures served January 16, 2015 pursuant to Rule 26, as follows:

(a)(1)(A)(iii) Categories/computation of damages.

Rental fee paid to Land Grant:	\$35,000
Rehabilitation Fee paid to Land Grant:	\$25,000
Amount accepted and to be paid to Ellwell pursuant to offer of judgment:	\$35,000
Attorney's fees and costs to date:	\$43,641.95
Paul Bardacke Mediation Fee:	\$5,458.95
OneBeacon Claims Lawyer Expenses for travel (flight and hotel)	<u>\$1200</u>
Total:	<u>\$154,100.99</u>

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By: /s/Geoffrey D. Rieder

Geoffrey D. Rieder

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Attorneys for Plaintiff Georgia Film Fund

Seventeen Productions, LLC